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DATE FILED: 3/6/2020

BY ECF

Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Susan V. Wallace v. Ryan D. McCarthy*, 18 Civ. 6525 (RA) (SN)

Dear Judge Netburn:

This Office represents defendant Ryan D. McCarthy (“Defendant”), the Secretary of the Army (“Army”), in the above-referenced employment discrimination case brought by *pro se* plaintiff Susan V. Wallace (“Plaintiff”). I write respectfully to request an adjournment of the conference currently scheduled for March 10, 2020, and an extension of the deadline for the completion of fact discovery.

On February 12, 2020, the Court scheduled a discovery conference for March 10, 2020, to discuss the issues raised in Defendant’s February 11, 2020, letter (Dkt. No. 63). (*See* Dkt. No. 64.) The parties’ understanding is that the Court also intended to address at that conference any disputes concerning Defendant’s responses to Plaintiff’s initial set of interrogatories and document requests, which were served on January 31, 2020. Defendant is working to respond to those requests but requires additional information from the Army in order to do so, and has accordingly requested from Plaintiff a two-week extension, to March 16, 2020, to serve its responses to Plaintiff’s requests. Plaintiff has consented to that extension. Accordingly, the parties respectfully request that the conference currently scheduled for March 10, 2020, be adjourned by approximately two weeks, so that Defendant serves his responses, and Plaintiff has time to review those responses, in advance of the conference. Additionally, because the parties are still in the process of exchanging document discovery, and thus have not yet scheduled or taken depositions, we respectfully request an extension from March 25, 2020, to April 30, 2020, of the deadline to complete fact discovery.¹ This is the parties’ first request for an adjournment of the conference and for an extension of this deadline.

¹ The parties request that the other deadlines set forth in the Court’s November 25, 2019, Scheduling Order (Dkt. No. 46) each be extended by approximately one month, such that opening expert reports would be due by June 8, 2020; rebuttal expert reports would be due by July 8, 2020; the deadline for completion of expert discovery would be August 6, 2020; and any summary judgment motions would be due by September 7, 2020.

We thank the Court for its consideration of this request.

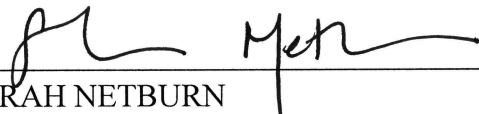
Respectfully submitted,

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By: /s/ Rachael L. Doud
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cc: Susan V. Wallace (by ECF)

The discovery conference currently scheduled for March 10, 2020, is ADJOURNED. The conference is RESCHEDULED to Friday, March 27, 2020, at 11:00 a.m. All fact discovery shall close April 30, 2020.
SO ORDERED.



SARAH NETBURN
United States Magistrate Judge

March 6, 2020
New York, New York